

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TOYOTA MOTOR SALES, U.S.A., INC.,

Plaintiff,

v.

CHINA SEAT COVER AUTOMOTIVE  
PRODUCTS CO., LTD, et al.,

Defendants.

Case No. 24-cv-11959

**Judge Andrea R. Wood**

**Magistrate Judge Beth W. Jantz**

**DECLARATION OF JUSTIN R. GAUDIO**

I, Justin R. Gaudio, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Toyota Motor Sales, U.S.A., Inc. (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. I hereby certify that the Defaulting Defendants (as defined in the accompanying Memorandum) have failed to answer or otherwise plead in this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A).
3. My office investigated the infringing activities of the Defaulting Defendants, including attempting to identify the owner of each associated e-commerce store operating under the Seller Aliases and its contact information. Our investigation confirmed that the Defaulting Defendants are primarily domiciled in China. As such, I am informed and believe that the Defaulting Defendants are not active-duty members of the U.S. armed forces.

4. **Exhibit 1** is an accurate copy of unpublished decisions cited in the corresponding Memorandum in Support of Plaintiff's Motion for Entry of Default and Default Judgment as to Certain Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of January 2025 at Chicago, Illinois.

/s/ Justin R. Gaudio  
Justin R. Gaudio  
*Counsel for Plaintiff*  
*Toyota Motor Sales, U.S.A., Inc.*